

Public Information and Records Integrity Branch (PIRIB)  
(7502C), Office of Pesticide Programs (OPP), Environmental Protection  
Agency, 1200 Pennsylvania Ave., NW.

Re: Docket ID Number OPP-2003-0274.

To all concerned Americans and their Representatives at the EPA,

I have just been made aware of a petition by Bayer CropScience to establish a tolerance for Glufosinate in or on Rice and Cotton, and I am gravely concerned about the health and economic risks such a tolerance would pose to all Americans. In short, I am asking that your office deny Bayer's request for approval of Glufosinate tolerance, and work with other government agencies to enact a more rigorous approval and testing process for transgenic crops.

I believe that by approving the residues requested by Bayer, you will be exposing the public to unnecessary health risks, potentially increasing use of toxic herbicides on rice and cotton, and endangering the livelihoods of farmers by shutting off valuable export markets that are rejecting transgenic crops. Also, it is impossible to control the contamination of non-genetically engineered (GE) crop fields by nearby GE fields, reducing consumer's choices.

I am also concerned about the loss of overseas markets for farmers growing transgenic crops and for farmers whose own ability to market their crops is threatened by genetic pollution. Many countries throughout the world are refusing transgenic crops and USDA organic standards strictly prohibit the use of transgenic seeds. Glufosinate tolerance levels have not been established by the international food standards commission, Codex Alimentarius. Events such as StarLink and last year's ProdiGene incident highlight the inadequacies of our current system in keeping transgenic crops segregated.

In Canada, farmers growing transgenic crops have detected triple herbicide resistance in weeds and volunteer canola plants as a result of gene transfer, rendering the herbicides useless. If Bayer's petition is approved, it will only be a matter of time before Red Rice, which is the same species as cultivated rice and also one of the most virulent weeds on rice farms, becomes resistant to Glufosinate. Similar gene transfer in rice will ultimately lead to the need for new, more toxic herbicides.

Peer-reviewed scientific studies have shown Glufosinate to be "highly toxic" to aquatic animals such as clams, oysters, water fleas, fish and birds at doses as low as 0.5 ppm. As rice is grown in an aquatic environment, the adoption of Glufosinate tolerant rice will have tragic impacts for the ecosystems of rice growing areas. The EPA classifies Glufosinate as "persistent" and it has been found in the edible parts of spinach, wheat and radishes more than 120 days after being sprayed with the chemical.

The approval of Glufosinate tolerant rice and cotton would send us a step

backward in our efforts toward a more sustainable agriculture. Please take action to ensure that our current system of agriculture moves toward one that is less reliant on chemicals, and ensures our farmers a prosperous livelihood. Please deny Bayer's request for approval of Glufosinate tolerance.

Thank you for your consideration.

Sincerely,

David Belt